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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	Chapter 11
	§	Case No. 21-30085-hdh-11
NATIONAL RIFLE ASSOCIATION OF AMERICA and SEA GIRT LLC	§	Jointly Administered
	§	
DEBTORS.	§	

**ACKERMAN MCQUEEN, INC.'S WITNESS AND EXHIBIT LIST FOR HEARING ON
APPLICATION OF THE DEBTORS FOR AN ORDER AUTHORIZING THE
RETENTION AND EMPLOYMENT OF ANKURA CONSULTING GROUP, LLC AND
APPOINTMENT OF LOUIS E. ROBICHAUX IV AS THE DEBTORS' CHIEF
RESTRUCTURING OFFICER**

TO THE HONORABLE HARLIN D. HALE,
UNITED STATES BANKRUPTCY JUDGE:

Ackerman McQueen, Inc. ("AMc") designates the following witnesses and exhibits for the hearing on the Application of the Debtors for an Order Authorizing the Retention and Employment of Ankura Consulting Group, LLC and Appointment of Louis Robichaux IV as the Debtors' Chief Restructuring Officer (Dkt. No. 519, filed 04/07/2021):

DESIGNATION OF WITNESSES

PLEASE BE ADVISED that AMc may, only to the extent necessary and in its sole discretion, offer the testimony of the following persons as witnesses at the Hearing. AMc further reserves the right to call any additional persons as witnesses at the Hearing, which may be designated or called by any other party. AMc, in its sole discretion, additionally reserves the right to call any and all additional witnesses as may be necessary for rebuttal and/or impeachment.

1. Wayne LaPierre;
2. Sonya Rowling;
3. Craig Spray;
4. David Warren;
5. Any witness necessary to authenticate the exhibits designated herein;
6. Any witness necessary to rebut and/or impeach the testimony of a witness called or designated by any other party; and
7. Any witness designated on another party's witness list.

DESIGNATION OF EXHIBITS

PLEASE BE ADVISED that AMc may, at its sole election, request that the Court take judicial notice of or otherwise offer any of the below listed documents into evidence at the time of the Hearing. AMc further reserves the right to offer any documents, which may be designated or offered by any other party. AMc, in its sole discretion, additionally reserves the right to offer any exhibits (whether designated below) as may be necessary for impeachment or rebuttal. AMc further reserves the right to supplement or amend this exhibit list at any time.

Exhibit	Date	Exhibit Identification	Offer	Admit
1.	03/04/21	NRA Amended Schedules A, B and D-H with Summary of Assets		
2.	03/04/21	NRA Amended Statement of Financial Affairs		
3.	03/05/21	Transcript of 341 Meetings of Creditors Sea Girt, LLC		
4.	03/12/21	341 Meeting of Creditors of Sea Girt		
5.	03/22/21	Deposition of LaPierre, Wayne [Vol 1] (Bankruptcy) (for reference)		
6.	03/23/21	Deposition of LaPierre, Wayne [Vol 2] (Bankruptcy) (for reference)		
7.	03/19/21	Deposition of Rowling, Sonya (Bankruptcy) (for reference)		
8.	03/24/21	Deposition of Spray, Craig (Bankruptcy) (for reference)		
9.	02/22/21	Sea Girt January MOR		
10.	02/22/21	NRA January MOR		

11.	03/22/21	Sea Girt February MOR		
12.	03/22/21	NRA February MOR		
13.	05/13/20	NRA Corporate Structure		
14.	04/15/21	Deposition of Robichaux, Louis (Bankruptcy) (for reference)		
15.	04/07/21	Application to Employ Ankura Consulting [ECF 519]		

AMc reserves the right to use additional exhibits not identified herein for purposes of rebuttal or impeachment. AMc also reserves the right to rely upon and use as evidence: (i) exhibits included on the exhibit list of any other parties in interest, and (ii) any pleading, hearing transcript, or other document filed with the Court in the above-captioned cases.

Date: April 20, 2021

Respectfully submitted,

DORSEY & WHITNEY LLP

/s/ H. Joseph Acosta

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**ATTORNEYS FOR ACKERMAN MCQUEEN,
INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served on all parties receiving notice by and through the Court's CM/ECF system on April 20, 2021.

/s/ H. Joseph Acosta

H. JOSEPH ACOSTA